

EXHIBIT D-3
VEASEY-LULAC
DUPLICATIVE

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DUPLICATIVE

BARON

Neil Baron

DATE		HOURS	Code
09/16/13	Phone conference with Veasey team	1.00	D
09/18/13	Phone conference with Veasey team	1.00	D
09/27/13	Telephone conference with Veasey Team regarding case startegy	1.00	D
02/06/14	Review email from Emma Simson regarding SOS 30(b)(6) ;	0.10	D
02/06/14	Review email correspondence from Chad Dunn regarding thoughts from Ransom (CPA expert) and incorporation into	0.20	D
02/06/14	Review email from Gerry Hebert regarding a lot of comments/edits to the 30(b)(6) draft - need to get them all on	0.20	D
05/28/14	Review Minute Entry from 5-28-14 hearing	0.20	D
05/29/14	Review transcript regarding telephonic conference held on 5-	0.20	D
06/06/14	Review Minute Entry fro Proceedings held before Judge Ramos on 6-6-14	0.20	D
06/16/14	Review Exhibits to (doc 332) - (doc 333)	0.20	D

TOTAL 4.3

DUPLICATIVE

BRAZIL-DUNN

Date	User	Description	Billable Time/ Cost Price	Code
08/14/2013	Chad Dunn	Continue work on draft of First Amended Complaint	4.20	D
08/18/2013	Chad Dunn	Incorporate edits to amended complaint from co-counsel	0.40	D
04/08/2014	Chad Dunn	Participate in trial preparation meeting of all Veasey Plaintiffs' counsel	6.50	D,E
05/28/2014	Chad Dunn	Receive multiple deposition notices	0.20	D
07/16/2014	Chad Dunn	Confer with clients regarding their scheduled depositions and prepare them for same	0.50	D
07/22/2014	Chad Dunn	Receive amended deposition notices from State	0.10	D
07/28/2014	Chad Dunn	Receipt and review of several deposition notices	0.10	D
08/08/2014	Chad Dunn	Conference with Dr. Sanchez and Dr. Barreto regarding scheduling their depositions	0.30	C,D
09/10/2014	Chad Dunn	Receive and review Notice of Filing Transcript (Day 5 of Trial)	0.10	C,D
09/11/2014	Chad Dunn	Receive and review court's notification that transcript of 09-10-14 Day 7 of Trial available	0.10	C,D
##### ###	Chad Dunn	Receive and review Plaintiffs and Plaintiff-Intervenors' Notice of Filing Trial Exhibits (ECF 660-677)	0.10	D
11/14/2014	Chad Dunn	Receive and review court notification of sealed documents filed (ECF 698-ECF 712)	0.10	C,D
11/21/2014	Chad Dunn	Receive and review Defendants' Notice of Filing Exhibits (ECF 791-ECF 804)	0.10	D
03/04/2015	Chad Dunn	Review briefs of other parties	1.20	D
03/26/2015	Chad Dunn	Review 28(i) letter	0.10	D
03/29/2015	Chad Dunn	Confer with the State regarding confidential exhibits	1.20	D
03/14/2016	Chad Dunn	Participate in team conference call	1.10	D

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TOTAL 16.4

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Date	User	Description	Billable Time/ Cost Price	Code
11/15/2013	Scott Brazil	Attend Civil Initial Pretrial Conference by telephone	0.90	D, E
03/05/2014	Scott Brazil	Prepare for and attend hearing on motion to compel by phone.	2.50	E,D
04/01/2014	Scott Brazil	Telephone attend in-person hearing in Corpus Christi	3.00	E, D
04/08/2014	Scott Brazil	Participate in trial preparation meeting of all Veasey Plaintiffs' counsel	6.50	D
04/08/2014	Scott Brazil	Prepare for and telephone attend status conference	1.10	E,D
04/09/2014	Scott Brazil	Continue in-person meeting with all Veasey Plaintiffs' counsel in preparation for depositions and trial	5.50	D,E
04/11/2014	Scott Brazil	Multiple conferences regarding dividing effort for 30(b)(6) depositions	0.50	D
04/16/2014	Scott Brazil	Telephone attend hearing on the Amended Motion to Compel the Production of Documents Responsive to the Defendants' First and Second Requests for Production to the United States	1.80	D
05/01/2014	Scott Brazil	Telephone attend hearing on Motion to Quash Subpoena of Third Party Legislators	2.20	D, E
05/15/2014	Scott Brazil	Telephone attend Status Conference	1.20	D, E
05/20/2014	Scott Brazil	Prepare for and attend telephonic status conference	2.70	D, E
05/28/2014	Scott Brazil	Telephone attend status conference	2.40	D, E
05/30/2014	Scott Brazil	Conference with voter in Lufkin denied from voting for lack of ID	0.40	E,D
06/06/2014	Scott Brazil	Telephone attend status conference	1.20	D
06/18/2014	Scott Brazil	Telephone attend status conference	1.50	D,E
07/24/2014	Scott Brazil	Telephone attend status conference	2.30	D,E
07/30/2014	Scott Brazil	Telephone attend status conference	1.80	D,E
08/06/2014	Scott Brazil	Telephone attend Status Conference	1.80	D,E
08/06/2014	Scott Brazil	Prepare additional Findings of Fact section for fact witness depositions that I covered	3.20	D

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BRAZIL-DUNN

08/14/2014	Scott Brazil	Telephone attend status conference	1.00	D
08/18/2014	Scott Brazil	Work on Findings of Fact designation for several Veasey plaintiffs	1.10	D
08/22/2014	Scott Brazil	Receive and review Defendants' Proposed Findings of Fact/Conclusions of Law	0.10	D
09/02/2014	Scott Brazil	Attend Trial (Day 1)	10.20	E,D
09/03/2014	Scott Brazil	Attend Trial (Day 2)	10.20	E,D
09/04/2014	Scott Brazil	Attend trial (Day 3)	10.20	E,D
09/05/2014	Scott Brazil	Attend trial (Day 4)	10.00	E,D
09/05/2014	Scott Brazil	Receive and review court's docket entry regarding Trial (Day 4)	0.10	D
09/08/2014	Scott Brazil	Attend trial (Day 5)	10.20	E,D
09/09/2014	Scott Brazil	Attend trial (Day 6)	10.20	E,D
09/10/2014	Scott Brazil	Attend trial (Day 7)	10.20	E,D
09/11/2014	Scott Brazil	Attend trial (Day 8)	7.10	E,D

TOTAL 123.1

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<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>	<u>Code</u>
6.26.13	Review C.Dunn's draft of complaint & edit same	0.9	D
	immediate implementation of photo ID law (SB 14)	0.2	D
	claims to make in amended complaint	0.2	D
	re: additional claims in amended complaint	0.2	D
	of new plaintiffs in amended complaint	0.3	D
	witnesses	0.3	D
	discovery issues (coordination)	1	D
9.13.2013	Call w/ co-counsel re: scheduling, discovery	1	D
	re: discovery schedule and trial date/length issues	1.1	D
	and other deadlines	1	D
	whether they will oppose DOJ's motion for a stay	0.2	D
10.2.13	Review draft of litigation hold letter	0.4	D
10.3.13	Review A. Derfner's edits to litigation hold letter	0.1	D
10.3.13	Make final edits to litigation hold letter	0.3	D
	& whether to seek a prelim. inj. for upcoming elections	1.5	D
	services to be performed by experts (Baretto, et al.)	0.4	D
	re: implementation of ID law	0.3	D
	experts' cost estimates provided us (incl. scope of reports)	0.4	D
	motion to dismiss	0.2	D
	dates & trial date to provide court	0.6	D
	potential expert witness re: TX matching database issues	0.5	D
	by TX in motion to dismiss	1	D
	identification of lay witnesses, assignments to counsel	1.1	D
	resulting tasks to counsel (discovery doc prep/MTD)	0.9	D
	coordination of tasks to avoid duplication	1.2	D
	plaintiffs, adding new claims in an amended complaint	1.7	D,E
12.6.13	Prepare second amended complaint for clients	1.1	D,E
	by TX's 2nd MTD	0.8	D
	re: discuss due process claims for inclusion in brief	0.6	D
	co-counsel	0.2	D
	planned discovery; and our answers to interrogatories	0.3	V,D
	edits to NAACP LDF counsel (Haygood/Korgaonkor)	0.3	D
	in case going forward	0.3	D
	and depositions	0.8	D
	next discovery actions to be taken, trial schedule	1.1	D,E
4.6.14	Review draft interrogatories and RFP and edit same	0.4	D

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<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>	<u>Code</u>
	current experts & what analyses we want them to perform	7.1	D,E,N
	current experts & what analyses we want them to perform	10.3	D,E
	deponents (15-20) that Veasey-LULAC wants to depose	0.4	D
	assignment of responsibilities	1.1	D,E
	strategy and assignments to avoid duplication	2.5	D,E
	litigation responsibilities & strategies	1	D,E
4.9.14	Review our (Veasey-LULAC) draft interrogatories & RFPs	0.4	D
	provisional voters due to ID	0.8	D
	retained, data needed and scheduling of depositions	1	D
	needed, coordination of same & assignments	1.5	D,E
	assignments; legal research of issues needed	1.5	V,D,E
5.8.14	TC w/all private plaintiffs' attys re: discovery coord.	1	V,D,E
	expert analysis, and other discovery	0.7	D
	discovery planning	1.1	D,E
	disputes/issues	1.7	D,E
	planned discovery, expert timetable (& data needed)	1.8	D,E
5.22.14	TC w/all private plaintiffs re: outstanding & future discovery	1.1	D,E
5.22.14	Call w/all plaintiffs (including DOJ) re: discovery	0.9	D,E
5.29.14	TC w/private plaintiffs (weekly status call to coordinate)	1	D,E
5.29.14	TC w/all plaintiffs (including DOJ) (weekly status)	0.5	D,E
5.30.14	TC w/Veasey-LULAC team re: discovery, data, next steps	1.5	V,D,E
	to be contacted.	1.6	V,D,E
	further discovery)	0.7	D,E
	work being performed by experts.	1.9	D,E
	schedule	3	D,E
	witnesses; discuss deposition transcripts to be reviewed	1.3	D,E
	upcoming deadlines	0.8	D,E
	plaintiff groups are working on.	0.7	D,E
7.2.14	Call with Veasey-LULAC legal team re: expert reports	1.5	D,E
	team assignments; expert reports & depositions	1.1	D,E
	trial preparations	4.5	D,E
	later today	0.4	D,E
	expedite appeal	1.2	D
11.24.14	Review/edit Josh's draft motion to expedite appeal	0.7	D
11.25.14	Review/edit Josh's draft motion to expedite appeal	0.4	D
12.3.14	TC w/Veasey-LULAC legal team re: appeal coordination	0.7	D

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<u>Date</u>	<u>J. Gerald Hebert Description</u>	<u>Time (Hrs/tenths)</u>	<u>Code</u>
	outline of district court decision for use in appellate brief	1.5	D
	on revisions	1.5	D
2.23.15	Review and edit merits brief in 5th circuit	2.9	D
	should argue in 5th circuit and length of argument	1.1	D
	to be made in 5th circuit & strategies & emphasis (4.0)	2	D
5.29.15	Calls and prep and follow-up re: Texas 28j letter	1.5	D
	LULAC Legal Team to consider	0.3	D
	along the lines of my outline	0.2	D
TOTAL		93.3	

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<u>Emma Simson Description</u>	<u>Date</u>	<u>Hours</u>	<u>Code</u>
Call w/ Armand re: Reponse to TX Mot to Dismiss 2nd Complaint	1/10/2014	0.6	D
Call w/ plaintiffs re: factual development	1/28/2014	1.5	D,E
Call w/ Chad Dunn re: algorithms, survey	1/28/2014	0.4	D
Call w/ Armand and Chad re: consent protective order, algorithm	1/30/2014	1.0	D,E
Call with all plaintiffs	3/20/2014	0.8	D
Ingram deposition	4/23/2014	1.2	D,E
Call w/ Armand, redrafting notes for depo prep Cesinger	5/19/2014	1.4	D
Call w/ D Whitley and Armand re RFPs	5/22/2014	0.4	D
Call w/ Armand re: conference with State	5/22/2014	0.2	D
Call w/ Armand, Revising e-mail to court, discussing Data issue	5/28/2014	1.3	D
Calls w/ M. Posner, A. Derfner re: proposed orders	5/29/2014	0.3	D
Call w/ Ezra, Armand re CI statement	6/1/2014	0.8	D
Call w/ Armand, Herron re: databases, algorithms	6/1/2014	0.7	D
Call re Lichtman (Gerry, Armand, Ben)	6/3/2014	0.8	D
Court hearing	6/6/2014	1.0	D
Call w/ Armand	6/10/2014	0.2	D
Call w/ Michael Herron, Armand	6/17/2014	2.0	V,D
Discovery matters (calls with Armand, Anna, Vishal, April, witnesses, etc., document production issues, reviewing materials, etc.)	6/20/2014	7.0	D,V,E
Call w/ Armand re data production issues	7/29/2014	0.4	D
Call w/ Chad re data production issues, hearing	7/29/2014	0.3	D
Call w/ Armand, Anna re data production issues	7/29/2014	0.3	D
Call w/ Armand re claims	7/31/2014	0.5	D
Call w/ Armand re claims	7/31/2014	0.4	D
Call w/ Armand re claims	7/31/2014	0.2	D
TOTAL		23.7	

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DERFNER ALTMAN

Dorfner & Altman, LLC Armand G. Dorfner, Esquire				
Jul-18-14	AGD	Draft FOF, COL. Poll tax.	9.00	D
Jul-19-14	AGD	Draft FOF/COL. Crawford balancing test.	7.50	D
Jul-20-14	AGD	Draft FOF/COL Crawford Balancing test.	8.50	D
Jul-21-14	AGD	FOF and COL on Crawford claim.	11.50	D
Jul-28-14	AGD	Veasey counsel call, Tel ES and Scott re: Willi	5.00	D, B
Aug-05-14	AGD	All plaintiffs meeting.	5.00	D,E
Sep-15-14	AGD	Review drafts of FOF and COL, draft new por	10.00	D
Sep-16-14	AGD	Draft FOF/COL, including review transcripts	10.00	D
Sep-17-14	AGD	Draft FOF/COL.	10.00	D
Sep-18-14	AGD	Draft FOF/COL.	10.00	D
Sep-19-14	AGD	Review FOF/COL as filed, begin preparing clo	8.00	D
Apr-22-15	AGD	Moot court at DOJ.	4.00	D
Apr-24-15	AGD	Moot court at LDF.	2.00	D
TOTAL			100.5	